

**BOULT
CUMMINGS
CONNERS
& BERRY_{PLC}**

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October 4, 2000

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EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

In Re: *Generic Docket to Establish UNE Prices for Lines Sharing per FCC 99-355, and
Riser Cable and Terminating Wire as Ordered in TRA Docket 98-00123.*
Docket No. 00-00544

Dear David:

Please find enclosed the original and thirteen copies of Covad Communications Company's First Interrogatories and First Request for Production to BellSouth Telecommunications, Inc. in the above-captioned proceeding.

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl
Attachment
c: Parties

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

RECEIVED IN
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EXECUTIVE SECRETARY

In Re:)
Generic Docket to Establish UNE Prices for)
Line Sharing Per FCC 99-355, and Riser Cable)
And Terminating Wire as Ordered in TRA)
Docket 98-00123)

Docket No. 00-00544

**COVAD COMMUNICATIONS COMPANY'S FIRST INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

DIECA Communications, Inc., d/b/a Covad Communications Company ("Covad"), hereby serves its First Set of Interrogatories and Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth") in writing, under oath.

Please provide the name, address and relationship to BellSouth of each person providing answers to the following interrogatories, and identify which question(s) each person answered.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc, its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to BellSouth.
3. "Cost Study," "Cost Studies," "Cost Model," and "Cost Models" refer to the "recurring cost studies," including all study summaries, work papers, study inputs and supporting documentation filed by BellSouth in this proceeding.
4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
5. The term "document" shall have the broadest possible meaning under applicable

law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" or "or" as used herein shall be constructed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information that would not otherwise not be brought within their scope.

8. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

9. “Identify” or “identifying” or “identification” when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

10. “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

11. “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;

- f) the identify of each person to whom it was sent;
- g) the identify of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is not longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

INTERROGATORIES

1. What number of special service lines does BellSouth have in Tennessee?
2. What number of PBX analog circuits designed with load coils does BellSouth have in Tennessee?
3. What number of Centrex lines designed with load coils does BellSouth have in Tennessee?
4. What number of ATM lines does BellSouth have in Tennessee?

5. What percentage of load points does BellSouth have in Tennessee which are underground in man holes?
6. What percentage of load points does BellSouth have in Tennessee that are buried facilities?
7. What percentage of load points does BellSouth have in Tennessee that are aerial?
8. What is the number of BellSouth retail/industrial/consumer ADSL lines in Tennessee?
9. What is the number of BellSouth business ADSL lines in Tennessee?
10. Can a BellSouth industrial/consumer ADSL customer be rolled from an all copper loop to a loop that is copper and fiber?
11. If so, what provision is made to attempt to continue providing DSL service to those ADSL customers?
12. What number or percentage of copper loops under 18,000 feet in Tennessee have load coils?
13. How many load coils are on each loop identified in No. 12?
14. What number or percentage of copper loops under 18,000 feet in Tennessee have bridged taps longer than 2,500 feet?
15. What is the exact number of cables and length of cable assumed in BellSouth's line sharing cost study?
16. Please describe how BellSouth arrived at the assumption of cable number and length.
17. How much pulp (by percentage) cable exists in BellSouth's network in Tennessee?

18. If Covad performs a loop make-up electronically and finds a loop it wants to order, can Covad reserve that loop and buy it as a voice grade SL1 loop?

19. Will BellSouth perform loop modification (i.e., removal of load coils) on a SL1 loop that Covad orders?

20. Please provide any information available that identifies how the Telecordia Software Investment/Expense amount included in the UNE Cost Study will be spent. For example, if a portion of the total amount is to be spent updating/enhancing the COSMOS system, please identify that amount and explain the enhancements that must be made. Please account for all of the \$38,000,000 Telecordia Software Investment/Expense.

21. Please provide all internal documents that estimate or otherwise budget for the \$38,000,000 investment in Telecordia Software. Your complete answer should include any planning documents, budget documents, requisition forms, internal memos, email, etc.

22. If no documents exist in response to question 21 above, please identify the process by which BellSouth intends to invest \$38,000,000 without internal planning, budgeting or requisition support documentation. If no such documents exist, please provide rationale for BellSouth's undertaking a \$38,000,000 investment (and approximately \$500,000 in monthly expenses) without such documentation or associated planning. Your complete answer should include an explanation as to whether such an investment without associated planning is either: extremely rare, rare, common, extremely common or no opinion.

23. Will any of the \$38,000,000 investment or corresponding \$500,000 monthly maintenance expenses be used to support BellSouth's xDSL services wherein both voice and data services are supplied on the same loop?

24. Please explain in detail and provide any supporting documents that describe how the \$585,000 per month maintenance expenses will be spent, including, but not limited to, an explanation of what work activities will be required for line sharing OSS maintenance, the number of employees or contractors that will be engaged in line sharing OSS maintenance, and the level of compensation for those employees or contractors.

24. If the answer to question 23 above is anything other than an unequivocal yes, please explain in detail why BellSouth will incur this investment and expense solely for use by its competitors when it must also provision a shared line when it provides its own xDSL services to its retail customers directly or through our affiliate.

24. Please identify the subject matter expert capable of explaining the Telecordia software investment made for line sharing.

25. How many stand alone xDSL loops are currently in place in Tennessee?

6. Please identify the amount of time BellSouth believes it will take to do the central office work related to provisioning a line shared loop.

26. Once the electronic loop makeup process is functional, will UCLs ordered be designed with any fallout?

27. If a loop is found that requires loop conditioning using the electronic process, can loop conditioning be ordered electronically?

28. Does BellSouth build any time into its cost studies for any manual work to assure that there are no BellSouth mistakes from the electronic database?

29. Please identify all size splice cases that are used in Tennessee and indicate the percentage of different sizes used by BellSouth in Tennessee.

30. Does BellSouth's cost study on loop modification assume that every manhole in Tennessee requires time to pump water from the manhole before loop modification work can be performed?

31. If the answer to Number 30 above is anything but an unequivocal yes, please explain the amount of time estimated for pumping water from a manhole for loop modification and the percentage of manholes BellSouth believes will require such work before loop modification work can be performed.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. In North Carolina, BellSouth's witness Greer testified to the existence of a March 1983 "directive" from AT&T indicating that Revised Resistance Design standards should be used. Please provide a copy of whatever directive BellSouth witness Greer testified about.

2. Please provide a copy of the documents which explain, refer to, authorize or detail the authority of BellSouth engineers to either: (1) proactively load cables with load coils, or (2) proactively unload cables, including but not limited to, any such documents that explain, refer to, authorize or detail the authority of engineers to do so in the 1970s.

3. Please provide copies of any documents discussing and/or describing the demand for DSL in Tennessee, including but not limited to, any documents that support the demand assumptions made by BellSouth in its loop modification additive assumptions.

4. Please provide copies of any studies, notes, and/or work papers that reflect the

work associated with how BellSouth arrived at the assumption in the line sharing cost study regarding the number and length of cable.

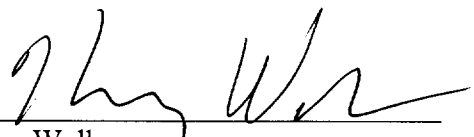
5. Please provide any information available that identifies how the Telecordia Software Investment/Expense amount included in the UNE Cost Study will be spent. For example, if a portion of the total amount is to be spent updating/enhancing the COSMOS system, please identify that amount and explain the enhancements that must be made. Please account for all of the \$38,000,000 Telecordia Software Investment/Expense.

6. Please provide all internal documents that estimate or otherwise budget for the \$38,000,000 investment in Telecordia Software. Your complete answer should include any planning documents, budget documents, requisition forms, internal memos, email, etc.

7. Please provide a copy of all contract related to, referring to or concerning any operation support systems upgrades BellSouth is planning or implementing for line sharing, including, but not limited to, any contracts with Telecordia and Andersen Consulting.

Dated: October 14, 2000

Respectfully submitted,

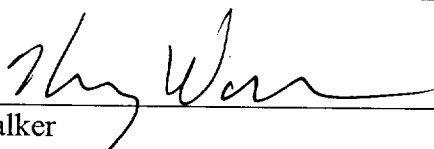

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CERTIFICATE OF SERVICE

I do hereby certify that I have this 4th day of October, 2000 served a true and correct copy of the foregoing via overnight delivery* and/or United States Mail to the following parties of record:

Guy M. Hicks* BellSouth Telecommunications, Inc. 333 Commerce Street Suite 2101 Nashville, TN 37201-3300	James B. Wright United Telephone 14111 Capital Boulevard Wake Forest, NC 27587-5900	Clay Arendes Vectris Telecom, Inc. 6500 River Place Blvd. Building 2, Suite 200 Austin, TX 78730
James P. Lamoreux AT&T 1200 Peachtree Street NE Room 4060 Atlanta, GA 30309	Charles B. Welch, Jr. Farris, Mathews, Branan, Bobango & Hellen 618 Church Street Suite 300 Nashville, TN 37219	T.G. Pappas R. Dale Grimes Bass, Berry & Sims 315 Deadrick Street Suite 2700 Nashville, TN 37238-002
Eric J. Branfman Swidler, Berlin, Shereff, Friedman 3000 K Street, Suite 300 Washington, DC 20007-5116	Susan Berlin MCI Telecommunications d/b/a MCI WorldCom 6 Concourse Parkway Atlanta, GA 30328	Bennett Ross BellSouth Telecommunications 675 West Peachtree Street Suite 4300 Atlanta, GA 30375
John Spilman Director Regulatory Affairs BroadSlate Networks, Inc. 675 Peter Jefferson Parkway Suite 310 Charlottesville, VA 22911		



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